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ENTRIX, INC.  
FRONT DESK

June 29, 1999

VIA FACSIMILE

Jean Baldridge  
Entrix, Inc.  
590 Ygnacio Valley Road, Suite 200  
Walnut Creek, CA 94596

Re: Comments on Draft Lower Santa Ynez River Fish Management Plan

Dear Jean:

The City of Lompoc submits the following comments on the draft Lower Santa Ynez River Fish Management Plan:

Volume I: Management Plan

No comments at this time.

Volume II: Appendices

Page B-1-1: The last bullet point should be amended as follows:

"... maintain groundwater recharge requirements as set forth in WR 89-18 and WR 94-5, or as amended by the SWRCB (downstream water rights)."

Page B-2-1: Table 2-3 should provide some quantification or definition of the terms "relatively abundant," "relatively common" and "present but in low numbers."

Page B-3-3: The discussion in Section 3.3 on Downstream Water Rights needs to be rewritten as it mischaracterizes the downstream water rights and WR 89-18. The following must be deleted from the report as it misstates the nature and origin of the downstream water rights:

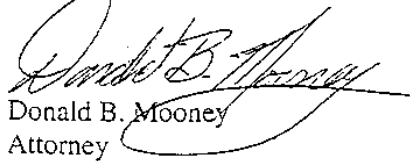
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"Current water rights for users downstream of Lake Cachuma were set forth by the SWRCB in 1973 (WR 73-37), as amended in 1989 (WR 89-18). These water rights and their associated releases from Lake Cachuma are principally structured by creating two accounts, and accruing credits (storing water) for the above and below Narrows areas in Lake Cachuma."

The downstream water rights are appropriative and overlying groundwater rights that were acknowledged by the State Water Resources Board ("SWRB") in Decision 886. Neither the SWRB nor the SWRCB has conferred any water rights on the downstream water right holders. WR 73-37 and WR 89-18 are orders that require Reclamation to release water to protect the existing downstream water rights.

Please inform me if Lompoc's comments and changes are not acceptable and if they are not to be included in any future version of the Fish Management Plan. In the meantime, please do not hesitate to contact me if you have any questions regarding this matter.

Very truly yours,

  
Donald B. Mooney  
Attorney

DBM:sb

cc: Gary Keefe  
Sharon Stuart  
Stuart L. Somach  
Paula Landis